

June 28, 2022

VIA EMAIL

Miranda Van Vleet
State Parks & Trails CRM Program
MN Dept. of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

RE: Charles Lindbergh State Park – Tenant Farmers House Removal
T129 R29 S30, Little Falls, Morrison County
SHPO Number: 2022-1791

Dear Miranda Van Vleet:

Thank you for the opportunity to comment on the above referenced project. Information received on May 23, 2022, has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and the Minnesota Field Archaeology Act (Minn. Stat. 138.40).

According to your May 23rd letter, the Minnesota Department of Natural Resources (MnDNR) is proposing to demolish the Tenant Farmer's House at Charles Lindbergh State Park. This property is a contributing resource to the **Charles A Lindbergh State Park and Lindbergh House** historic district, which is listed in the National Register of Historic Places (NRHP).

Considering the fact that the MnDNR has responsibilities under Minn. Stat. 138.665 Subd. 2 to "protect the physical features and historic character" of historic properties designated in the NRHP, we find it is unfortunate that the house has fallen into such a state of disrepair and that the MnDNR has not been able to identify a use for the historic property. We agree that demolition of the house will have an **adverse effect** on the historic property. Pursuant to the MnDNR's responsibilities under Minnesota Statute 138.665, our office and the MnDNR will need to agree in writing on a "suitable course of action" to mitigate for the adverse effect to the historic property before the demolition can proceed.

According to your correspondence, the MnDNR is proposing to complete a Minnesota Historic Property Record for the house, but it is not clear what level of documentation the MnDNR is proposing to complete. Because of the significance of this building in association with the historic district, as well as the Charles A. Lindbergh House (National Historic Landmark), we believe that Level I MHPR documentation is most appropriate, and we look forward to discussing additional mitigation measures as well. In this regard, we recommend that the MnDNR consult with the Minnesota Historical Society, specifically with the Charles Lindbergh House and Museum staff, as well as the Morrison County Historical Society to seek their input on additional mitigation measures, including, perhaps, public interpretive programming at the site, or at the Charles Lindbergh House and Museum, if deemed appropriate.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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Also, due to the nature and location of the proposed project, we recommend that a Phase I archaeological survey be completed prior to demolition of the property. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility, specifically contributing or noncontributing status within the historic district, of any properties that are identified.

Once the MnDNR has invited the Charles Lindbergh House and Museum staff and the Morrison County Historical Society to participate in consultation, has completed meaningful consultation with all parties to identify appropriate mitigation measures, and has decided on the mitigation measures the agency would like to pursue, a Suitable Course of Action plan should be developed and submitted to our office for review and concurrence. The plan should include well defined mitigation measures, define who will be responsible for completing the mitigation measures and coordinating any necessary reviews by our office and/or other interested parties, and include dates by which the measures will be completed.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

We look forward to further consultation on this project. If you have any questions regarding our comments, please contact Kelly Gragg-Johnson, Environmental Review Program Specialist, at (651) 201-3285 or kelly.graggjohnson@state.mn.us.

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers". The signature is written in a cursive, slightly slanted style.

Sarah J. Beimers
Environmental Review Program Manager